

## REMARKS

Claims 1-22 remain herein. No claims have been added or cancelled.

All of the pending claims 1-22 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Liu. Applicants traverse the rejection.

Claim 1, which for purposes of responding to the issues raised in this Office Action are representative of all independent claims, recites “providing a continuous real-time clock to a non real-time simulator” and “synchronizing a simulation clock of the non real-time simulator with the continuous real-time clock on a continuous basis.” Neither of these limitations is provided by Liu.

Applicants contest the finding that Liu teaches a continuous real-time clock being provided to a non real-time simulator as recited in claim 1. The Office Action equates the claimed non-real time simulator with Liu’s teachings of the OPNET simulation tool. As disclosed by Liu 5:51-55, the OPNET simulation tool is deployed on each of the subsystem platforms SP. Thus, to arguably meet the claim language of “providing a continuous real-time clock to a non real-time simulator,” Liu would need to disclose that its subsystem platforms SP (either with the OPNET tool or some other simulation package) receive a real time clock.

This is simply not the case. As noted by the Office Action, the Liu discussion of real time clock use is with respect to the operations of Fig. 9. As expressly stated by Liu, the operations of Fig. 9 are performed by the system controller 60, and specifically the synchronizer 62 of the system controller 60. Liu at 9:38-42 and 9:55-56. As shown in Liu Figs. 2 and 8, the system controller 60 (and its synchronizer 62) are distinct elements from the subsystem platforms SP. Thus, the system controller 60 receives the real time clock signal, not the subsystem platforms SP. To the extent that the Office Action considers an OPNET simulation

tool within the subsystem platforms SP to be the claimed “non-real time simulator,” then there is no disclosure in Liu of “providing a continuous real-time clock to a non real-time simulator.” Rather, it is the system controller 60 that controls the operation of the subsystem platforms SP. On this basis alone, the rejection based on Liu cannot be maintained.

In addition, Liu does not disclose the claim 1 language “synchronizing a simulation clock of the non real-time simulator with the continuous real-time clock on a continuous basis.” As noted above, it is the synchronizer 62 within system controller 60 that determines whether a simulation event can or cannot be executed. Liu discloses at 11:51-65 that the system controller 60 examines: (1) current simulation time  $T_{sim}$ ; (2) real-time  $T_{real}$ ; and (3) scheduled simulation time for the event  $T_{ev}$ . Assuming for the sake of argument that “real-time  $T_{real}$ ” equates to a “real time clock,” then Liu shows specifically at 11:54-65 that the simulation time  $T_{sim}$  is compared against the real time  $T_{real}$ , and that simulation events are triggered based on that comparison. But there is no disclosure that the simulation time  $T_{sim}$  is synchronized with the real time  $T_{real}$  as would be required by claim 1.

In support of the rejection, the Office Action cited numerous portions of Liu for its teachings that the subsystem platforms SP have synchronizing elements. However, claim 1 specifically requires synchronization between a real time clock and a simulation clock; synchronization of other signals simply does not meet the claim language. That is the case with Liu, which specifically discloses at, *e.g.*, Liu 7:58-8-9, that the synchronization performed by the individual SP’s relative to each other: “The timing for events occurring in one SP must be synchronized with events occurring at other SPs.” Liu 7:60-61. The Liu teachings cited by the Office Action therefore do not support a finding of synchronization (particularly at the SPs) of a simulation clock with a real time clock.

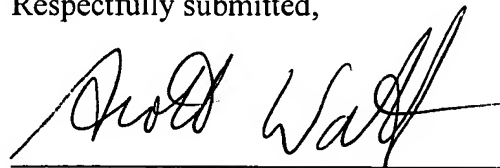
Accordingly, claim 1 recites at least two limitations that are not found in Liu. The rejection for anticipation may therefore not be maintained. Withdrawal of the rejection and allowance of the same is therefore respectfully requested.

Independent claims 7 and 17 have also been rejected under 35 U.S.C. § 102(b) as being anticipated by Liu. Both claims 7 and 17 recite similar language to claim 1 regarding the provision of a real time clock to the simulator and synchronization between the real time clock and the simulation clock. For the reasons discussed above, these limitations are not taught by Liu. Withdrawal of the rejections of claims 7 and 17 and allowance of the same is therefore requested.

All dependent claims are patentably distinct over the applied art for at least the reasons discussed with respect to the independent claims. Withdrawal of the rejection of these claims and allowance of the same is therefore requested.

Accordingly, the application is now fully in condition for immediate allowance and a notice to that effect is respectfully requested. The PTO is hereby authorized to charge/credit any fee deficiencies or overpayments to Deposit Account No. 19-4293 (Order No. 12492.0288). If there are any questions, the Examiner is invited to call applicants' undersigned attorney at the number listed below.

Respectfully submitted,



Date: December 16, 2008

Scott D. Watkins,  
Reg. No. 36,715  
STEPTOE & JOHNSON LLP  
1330 Connecticut Avenue, N.W.  
Washington, DC 20036-1795  
Tel: (202) 429-6420  
Fax: (202) 828-3658